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9 THOMAS WEISEL INTERNATIONAL  
PRIVATE LIMITED  
10

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
14

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15 THOMAS WEISEL PARTNERS LLC, a  
Delaware limited liability company, and  
16 THOMAS WEISEL INTERNATIONAL  
PRIVATE LIMITED, an Indian company,  
17

18 Plaintiffs,

19 v.

20 BNP PARIBAS, a French corporation, BNP  
PARIBAS SECURITIES (ASIA) LIMITED,  
21 a Hong Kong company, and PRAVEEN  
CHAKRAVARTY, an individual,  
22

23 Defendants.  
24  
25  
26  
27  
28

No. CV-07-06198 MHP

Action Filed: December 6, 2007

STIPULATION AND ~~[PROPOSED]~~  
ORDER RESCHEDULING HEARINGS  
AND SETTING SCHEDULE FOR  
REMAINING BRIEFING ON PENDING  
MOTIONS TO DISMISS(Civil L. R. 6-2)

1 WHEREAS, on March 7, 2008, Defendants BNP Paribas and BNP Paribas Securities  
 2 (Asia) Limited (collectively "the BNP Paribas Defendants") filed their Motion to Dismiss  
 3 Plaintiffs Thomas Weisel Partners LLC's and Thomas Weisel International Private  
 4 Limited's (collectively "TWP") First Amended Complaint for lack of personal jurisdiction  
 5 and forum non conveniens. The hearing on the BNP Paribas Defendants' Motion originally  
 6 was noticed for April 28, 2008.

7 WHEREAS, on March 20, 2008, the BNP Paribas Defendants and TWP entered into a  
 8 Stipulation re Jurisdictional Discovery and Vacating Hearing Date (Docket Entry No. 26),  
 9 pursuant to which the hearing date on the BNP Paribas Defendants' Motion was postponed  
 10 to allow the parties time to conduct discovery on issues raised by said Motion. This  
 11 Stipulation also provided that the BNP Paribas Defendants' Motion be heard no later than  
 12 July 28, 2008. The Court entered its Order approving this Stipulation on March 26, 2008  
 13 (Docket Entry No. 29).

14 WHEREAS, on April 24, 2008, Defendant Praveen Chakravarty ("Chakravarty") filed  
 15 his Motion to Dismiss TWP's First Amended Complaint. Thereafter, Chakravarty noticed  
 16 the hearing on his motion for July 28, 2008 (Docket Entry No. 37).

17 WHEREAS, on June 18, 2008, the parties' Stipulation and [Proposed] Order Re  
 18 Consolidated Opposition to Defendants' Jurisdictional Motions and Request for Additional  
 19 Pages was filed, setting forth the parties' agreement that TWP would file one consolidated  
 20 opposition to the two separate pending Motions to Dismiss of no more than 40 pages in  
 21 length (Docket Entry No. 42). On June 23, 2008, the Court entered its Order granting TWP  
 22 said relief (Docket Entry No. 44).

23 WHEREAS, it came to the attention of the BNP Paribas Defendants in the process of  
 24 preparing a Re-Notice of Hearing on their Motion to Dismiss that the Court is unavailable on  
 25 July 28, 2008 to hear the two pending Motions to Dismiss;

26 WHEREAS, August 18, 2008 is the first date that counsel for all of the parties and the  
 27 Court are available to conduct the hearing on the two pending Motions to Dismiss;

28 WHEREAS, the parties submit the instant Stipulation and Proposed Order in order to  
 STIPULATION AND [PROPOSED] ORDER RE HEARING ON MOTIONS TO DISMISS C-07-6198 MHP

1 obtain relief from the current July 28, 2008 motion hearing deadline set by the Court in its  
2 aforesaid March 26, 2008 Order, and to set the schedule for the remaining briefing on the  
3 pending Motions to Dismiss.

4 NOW, THEREFORE, the Parties HEREBY STIPULATE AND AGREE as follows:

5 1. The hearing on the BNP Paribas Defendants' Motion to Dismiss TWP's First  
6 Amended Complaint shall be rescheduled for August 18, 2008 at 2:00 p.m. in Courtroom 15  
7 of the above-captioned Court before the Honorable Marilyn Hall Patel.

8 2. The hearing on Chakravarty's Motion to Dismiss, currently scheduled for July  
9 28, 2008, shall be taken off calendar and rescheduled for August 18, 2008 at 2:00 p.m. in  
10 Courtroom 15 of the above-captioned Court before the Honorable Marilyn Hall Patel.

11 3. TWP shall file its consolidated opposition papers to the two aforesaid Motions to  
12 Dismiss on or before July 10, 2008.

13 4. The BNP Paribas Defendants and Chakravarty shall file their reply papers in  
14 support of their respective Motions to Dismiss on or before August 4, 2008.

15 IT IS SO STIPULATED AND AGREED:

16  
17 Dated: June 27, 2008

GILBERT R. SEROTA  
MARK A. SHEFT  
MICHAEL L. GALLO  
HOWARD RICE NEMEROVSKI CANADY  
FALK & RABKIN  
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21 By: /s/  
22 MARK A. SHEFT

23 Attorneys for Plaintiffs  
24 THOMAS WEISEL PARTNERS LLC  
25 and THOMAS WEISEL  
26 INTERNATIONAL PRIVATE  
27 LIMITED  
28

1 Dated: June 27, 2008

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7 PARIBAS and BNP PARIBAS  
SECURITIES (ASIA) LIMITED

8 Dated: June 27, 2008

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11 By: Tracy Thompson  
12 TRACY THOMPSON

13 Attorneys for Defendant  
14 PRAVEEN CHAKRAVARTY

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FALK  
& RABKIN  
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15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16  
17 July 3  
18 Dated: ~~June~~ July, 2008



1 Dated: June 27, 2008

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8  
9 Dated: June 27, 2008

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11 By:  \_\_\_\_\_  
12 TRACY THOMPSON

13 Attorneys for Defendant  
14 PRAVEEN CHAKRAVARTY

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16  
17  
18 Dated: June \_\_\_, 2008

19  
20 \_\_\_\_\_  
21 Judge Marilyn Hall Patel  
22 United States District Judge